

EXHIBIT A

ZACCARO | MORGAN
LLP

THOMAS A. ZACCARO
PARTNER

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October 19, 2015

Donald Searles, Esq.
Peter DelGreco, Esq.
U.S. Securities and Exchange Commission
444 S. Flower Street
Los Angeles, CA 90071

David Zaro, Esq.
Allen Matkins Leck Gamble Mallory & Natsis LLP
515 South Figueroa Street, 9th Floor
Los Angeles, California 90071-3309

Re: SEC v. Steve Chen, et al., CV15-07425 RGK (GJSx)

Dear Counsel:

I am writing on behalf of Jennifer Zhao, whom we represent in the above-referenced matter. We are informed that Bank of America has improperly frozen the following accounts based on the temporary restraining order ("TRO") and preliminary injunction ("PI") that the SEC obtained in this case:

<u>Account No.</u>	<u>Account Holder</u>
000153374232	UTMA Account for David Chen Li Zhao (Jennifer Zhao is the sole custodian)
000153467748	Ally Investors LLC
325058386448	Ally Investors LLC
*****65G9	Safe deposit box

We do not believe that these accounts should be frozen under the TRO and PI. The accounts are neither specifically identified in the TRO and PI nor "held in the name of, for the benefit of, or over which account authority is held by" any of the defendants in this case. The UTMA account is held solely in the name of Jennifer Zhou as custodian for her son, David. The two remaining bank accounts are held in the name of Ally Investors LLC, Ms. Zhou's business, and are unrelated to Mr. Chen or any of the other defendants. The last account is a safety deposit box held by Ms. Zhou. Bank of America has also frozen one

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Page 2

other account (Account 01534-02299) that is jointly held by Mr. Chen and Ms. Zhou, but we are not contesting the freezing of that account at this time.

Attached please find the correspondence Ms. Zhou received from Bank of America informing her that these accounts are frozen. We request that you take the steps necessary to inform Bank of America that these accounts (except for account 01534-02299) are not subject to the asset freeze.

Thank you in advance for your anticipated cooperation.

Very truly yours,

Thomas A. Zaccaro
ZACCARO MORGAN LLP



5701 HORATIO STREET
UTICA, NY 13502

September 29, 2015

CUTMA FOR DAVID CHEN LI ZHAO, CUSTODIAN
753 CARRIAGE HOUSE DR
ARCADIA, CA 91006-2041

Regarding Reference number: U092315000606
Court Case Name: Steven Chen, et al
Court Case Number: CV15-07425 RDK (GJSx)

Bank of America N. A. has been served with a Temporary Restraining Order relating to property that you maintain with us. As required by the court order, we have frozen the funds in the following account(s), which will remain frozen pending further order(s) from the court:

Account Number(s)
*****4232

Additional funds deposited to the account(s) may be subject to this hold until we are directed by court order to release the funds.

A non-refundable fee of \$100.00 will be assessed to your account for processing the Temporary Restraining Order.

If you have any questions regarding this Temporary Restraining Order please contact U.S. Securities and Exchange Commission.

If you have questions about your account, please contact our Customer Service Center toll-free at 1.800.432.1000. We are available Monday through Friday 7 a.m. to 10 p.m. Local. To speak with a Spanish-speaking associate, please call us toll-free at 1.800.688.6086. For hearing impaired assistance, TTY or TDD, please call us toll-free at 1.800.288.4408. Global Clients, please call the customer service number located on your statement. If you need to forward any additional correspondence to us regarding this case, please mail it to the address listed above. When contacting us regarding this notice, please use the Reference number listed above.

Legal Order Processing



5701 HORATIO STREET
UTICA, NY 13502

September 29, 2015

ALLY INVESTORS LLC
753 CARRIAGE HOUSE DR
ARCADIA, CA 91006-2041

Regarding Reference number: U092315000606
Court Case Name: Steven Chen, et al
Court Case Number: CV15-07425 RDK (GJSx)

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Account Number(s)
*****7748
*****6448

Additional funds deposited to the account(s) may be subject to this hold until we are directed by court order to release the funds.

A non-refundable fee of \$100.00 will be assessed to your account for processing the Temporary Restraining Order.

If you have any questions regarding this Temporary Restraining Order please contact U.S. Securities and Exchange Commission.

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September 29, 2015

LI CHEN LI ZHAO
753 CARRIAGE HOUSE DR
ARCADIA, CA 91006-2041

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Account Number(s)
*****2299

Additional funds deposited to the account(s) may be subject to this hold until we are directed by court order to release the funds.

A non-refundable fee of \$100.00 will be assessed to your account for processing the Temporary Restraining Order.

If you have any questions regarding this Temporary Restraining Order please contact U.S. Securities and Exchange Commission.

If you have questions about your account, please contact our Customer Service Center toll-free at 1.800.432.1000. We are available Monday through Friday 7 a.m. to 10 p.m. Local. To speak with a Spanish-speaking associate, please call us toll-free at 1.800.688.6086. For hearing impaired assistance, TTY or TDD, please call us toll-free at 1.800.288.4408. Global Clients, please call the customer service number located on your statement. If you need to forward any additional correspondence to us regarding this case, please mail it to the address listed above. When contacting us regarding this notice, please use the Reference number listed above.

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Account Number(s)
*****65G9

Additional funds deposited to the account(s) may be subject to this hold until we are directed by court order to release the funds.

A non-refundable fee of \$100.00 will be assessed to your account for processing the Temporary Restraining Order.

If you have any questions regarding this Temporary Restraining Order please contact U.S. Securities and Exchange Commission.

If you have questions about your account, please contact our Customer Service Center toll-free at 1.800.432.1000. We are available Monday through Friday 7 a.m. to 10 p.m. Local. To speak with a Spanish-speaking associate, please call us toll-free at 1.800.688.6086. For hearing impaired assistance, TTY or TDD, please call us toll-free at 1.800.288.4408. Global Clients, please call the customer service number located on your statement. If you need to forward any additional correspondence to us regarding this case, please mail it to the address listed above. When contacting us regarding this notice, please use the Reference number listed above.

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